



LAWRENCE LIVERMORE LABORATORY

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August 28, 1980

M. Fields
Containment Systems Branch
Division of Systems Integration
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Post Accident Combustible Gas Control Systems

References: 1) NUREG 0578 - TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations.

- Letter, H. R. Denton to all Operating Nuclear Power Plants, re Discussion of Lessons Learned Short Term Requirements, October 30, 1979.
- Telecon, M. Fields NRC Headquarters to W. Wade, EG&G SRO on August 7, 1980.

Dear Mel:

I have completed the survey of the responses by licensees to Recommendation 2.1.5 of NUREG 0578 (ref 1) and the subsequent October 30, 1979 clarification letter (ref 2) that you asked for during our conversation on August 7, 1980 (ref 3). I used the same response documents on hand at LLNL that I used earlier as a data base for the evaluation of Recommendation 2.1.4. There is some evidence that this document set is incomplete. I did not use the team evaluation reports or check on referenced documents that were not readily available.

The data extracted from the documents is presented on the attached exhibit based upon the checklist items you requested. Some of my observations are provided below including some clarifying comments.

- 1) The data base is representative of 65 of the 70 licensed plants as of January, 1980. Dresden 1, Humbolt Bay, Indian Point 1 and the two Three Mile Island plants were shut down indefinitely and not required to respond to the Lessons Learned recommendations at that time.
- 2) No attempt has been made to qualify the statements made by the licensee. For example, if a statement is made that "the components of the system are safety grade" or that "flow rates are satisfactory," it is assumed to be correct.

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- 3) As evidenced by Exhibit I, the basis for comparative evaluations is reduced to 50 plants since there was essentially no response to Recommendation 2.1.5 for nine plants including: Fitzpatrick, Millstone 1 & 2, Vermont Yankee 1, Calvert Cliffs 1 & 2, Maine Yankee and Surry 1 & 2; Six others did not consider this recommendation applicable to their plants. However, this basis could be increased since the Calvert Cliffs units are known to use H₂ recombiners (Section 2.1.5.C of Ref. 1) and the information on the Surry units was referenced to documents unavailable at LLNL.
- 4) Of the responding plants, 18 were found to employ $\rm H_2$ recombiners. Eleven of these are inside containment and redundancy is evident for all but Palisades which is suspected to also meet this requirement. Of the seven external systems three have dedicated containment penetrations, two do not and the remaining two did not clarify this position.
- 5) Thirty six plants are known to employ a purge system including four that also have internal $\rm H_2$ recombiners. Twenty one of these have redundancy, five do not and the other ten did not specify. Similarly, only nine of the plants utilize dedicated penetrations while seven do not and the remaining 20 did not specify.
- 6) Of the nine plants that do not employ dedicated penetrations for either type of system only five satisfy the single failure criteria.

Evaluation of the remaining items is fairly straightforward. In general, the data provided from these submittals on this Lessons Learned recommendation is very limited. It is apparent that additional work will be necessary to assure that all plants are adequately prepared.

Sincerely,

W. O. Wade

G. E. Cummings

Deputy, Reactor Safety

Nuclear Systems Safety Program

WOW: jlc

Attachment

cc: W. Butler, NRC

J. T. Telford, NRC

W. R. Ruvalcaba, EG&G-SRO

W. B. Hardin, LINL

G. Cummings, LINL

R. Peterson, LLNL-MIS

J. Kudrick, NRC

Exhibit 1

NR = Not Required C = Completed

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